

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Purple Innovation, LLC,  
Plaintiff.

v.

Moran Feliba, eBay accounts - netanelkim32 and Rotem1,  
Defendant (Pro Se),

William P. Dimitrouleas  
Honorable Judge

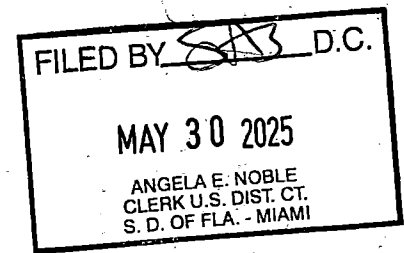
Magistrate Judge Patrick M. Hunt  
Honorable Magistrate Judge

Case No. [0:2025-cv-60807]

**MOTION TO DISSOLVE PRELIMINARY INJUNCTION AND**  
**REQUEST FOR ELECTRONIC ACCESS TO FUTURE**  
**PROCEEDINGS**

To the Honorable Judge of the United States District Court for the Southern District of Florida:

I, **Moran Feliba**, respectfully submit this **Motion to Dissolve the Preliminary Injunction** currently in place against operated by me **eBay selling accounts**, and additionally request that the Court allow me to participate in all future proceedings electronically. I submit this motion as a **sole proprietor representing myself (Pro Se)** and not on behalf of any company or corporate entity.



## **I. REQUEST TO REMOVE CURRENT PRELIMINARY INJUNCTION**

1. I respectfully move the Court to **remove or dissolve the existing preliminary injunction** that has been imposed on my operated eBay accounts.

2. This injunction has **effectively frozen my online business**, even though the **specific items that gave rise to the lawsuit were never sold (Based on eBay Records)**, and no profit was generated from them.

3. My eBay accounts have in total around **20,000 unrelated items**, all of which are now blocked to get payment as a result of this injunction, causing **catastrophic financial harm** and threatening the viability of my sole source of income. Every day the loss for my accounts not working is around \$200-400, much higher than the initial cost of the items (30-50\$) in question in lawsuit which weren't even ever sold.

## **II. IRREPARABLE HARM TO A SOLE PROPRIETOR**

4. I am a **sole proprietor**, not a company or LLC, and I am therefore directly and personally impacted by this injunction.

5. The **injunction has caused a complete hold on all funds and cash flow** through my online business accounts. I am now unable to pay for business expenses, suppliers, or even personal needs.

6. The items at issue in the lawsuit represent **a tiny fraction** of my listings. The **blanket impact of this injunction is disproportionate**, punishing my entire livelihood for a matter that has not even involved a completed sale.

### **III. INTERNATIONAL BARRIERS TO COMPLIANCE**

7. I reside in **Israel**, which makes physical mailing of legal documents to the Court extremely difficult, costly, and slow.
8. I respectfully request permission to participate in this case **electronically**, including:
  - Submitting filings via email or electronic systems;
  - Receiving notices and service electronically; and
  - Attending any hearings remotely via video conference.

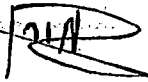
### **IV. CONCLUSION**

I respectfully ask this Court to:

1. **Dissolve the current preliminary injunction** that is disabling my eBay accounts and destroying my ability to operate as a sole proprietor; and
2. **Permit me to participate in this case electronically**, due to my status as an Israeli citizen with substantial international barriers to physical mail communication.

I appreciate the Court's time and consideration of this urgent matter.

Respectfully submitted,  
**Moran Feliba**(Pro Se)  
**eBay accounts netanelkim32 and Rotem1**  
Efraim Katzir 10  
Hod Ha Sharon  
Israel  
asirubin86@gmail.com  
+9720507722269  
**Dated:** 05/28/2025

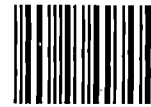
A handwritten signature in black ink, appearing to be 'Moran', with a large, stylized flourish extending to the right.

Moran Feliba  
19421 NE 22nd Rd  
N. Miami Beach, FL 33129

Retail



RDC 99



33128

U.S. POSTAGE PAID

FCM LETTER  
MIAMI, FL 33180  
MAY 28, 2025

\$4.85

92324H503172-56

U.S. District Court  
Southern District of Florida  
Wilkie D. Ferguson Jr. U.S. Courthouse  
400 N. Miami Ave  
Miami, FL 33128

Case # 2025-CV-60807  
Attention: Pro Se Filings

33128-771899

9589 0710 5270 2576 2091 98

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

**CERTIFIED MAIL®**



9589 0710 5270 2576 2091 98